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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DONE! VENTURES, LLC, a Delaware
Limited Liability Company,

Plaintiff,

vs.

GENERAL ELECTRIC COMPANY, a
New York Corporation; NBC
UNIVERSAL, INC., a Delaware
Corporation; iVILLAGE, INC., a
Delaware Corporation, and DOES 1
through 10, inclusive,

Defendants.

Case No. 2:10-cv-04420-SJO-JC

**PLAINTIFF'S EX PARTE
APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER AND ORDER TO
SHOW CAUSE RE:
PRELIMINARY INJUNCTION**

[Removed from Los Angeles
County Superior Court Case No.
BC439011]

**TO DEFENDANTS GENERAL ELECTRIC COMPANY, NBC
UNIVERSAL, INC., iVILLAGE, INC., AND THEIR ATTORNEYS:**

PLEASE TAKE NOTICE that Plaintiff DONE! Ventures, LLC, hereby
applies ex parte for a temporary restraining order and an Order to Show Cause
(OSC) hearing re: preliminary injunction.

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1 Good cause exists for the relief sought. Plaintiff contracted with defendants
 2 to purchase the domain names, women.com and women.net. Defendants have
 3 refused to transfer the domain names to plaintiff. Since the filing of this lawsuit,
 4 defendants first modified the domain names in a manner that injured their
 5 economic value. Then, defendants pointed the names to iVillage - Done's
 6 competitor - hurting Done's competitive position. Consequently, immediate,
 7 injunctive relief is necessary and proper.

8 Based on the declarations of Benjamin L. Padnos, Andrew Ball, and Patricio
 9 Barrera (hereafter "Padnos Dec.", "Ball Dec.", "Barrera Dec.", respectively) filed
 10 concurrently herewith, defendants General Electric Company, NBC Universal,
 11 Inc., and iVillage, Inc. should be ordered to show cause why defendants should
 12 not be enjoined pending trial of this action and ordered to:

13 1. Transfer the domain names Women.com and Women.net to an
 14 agreed-upon escrow agent so that a third party may reestablish Women.com and
 15 Women.net as web sites, which will be indexed by Google's search spider and the
 16 search spiders and indexing tools of other search engine providers until the
 17 hearing on the preliminary injunction set for _____, 2010;

18 2. File and serve on Plaintiff a statement, under penalty of perjury that
 19 each of the defendants have fully complied with the terms of the Court's Order and
 20 that to their knowledge, no other person is in violation of the terms of the Order.

21 Defendants should be further Ordered to Show Cause why defendants
 22 should not be restrained and enjoined pending trial in this action, as follows:

23 1. Pointing the domains to www.iVillage.com;
 24 2. Refrain from selling or transferring the domain names Women.com
 25 and Women.net;

26 3. Refrain from marketing, developing or otherwise encumbering the
 27 domain names Women.com and Women.net.

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TEMPORARY RESTRAINING ORDER

PENDING HEARING on the above Order to Show Cause, defendants, defendants' agents, employees, assigns and all those acting in concert with defendants should be ordered to:

1. Transfer the domain names Women.com and Women.net to an agreed upon escrow agent so that a third party may reestablish Women.com and Women.net as web sites, which will be indexed by Google's search spider and the search spiders and indexing tools of other search engine providers until the hearing on the preliminary injunction set for _____, 2010;

2. File and serve on plaintiff a statement, under penalty of perjury that each of the defendants have fully complied with the terms of the Court's Order and that to their knowledge, no other person is in violation of the terms of the Order.

Pending hearing on the above Order to Show Cause, defendants, defendants' agents, employees, assigns and all those acting in concert with defendants should be restrained and enjoined from:

1. Pointing the domains to www.iVillage.com;
2. Selling or transferring the domain names Women.com and Women.net; and
3. Marketing, developing or otherwise encumbering the domain names Women.com and Women.net.

Plaintiff requests that the Court establish a briefing schedule so that any opposition papers to the OSC shall be filed and served on Plaintiff DONE!'s counsel and reply papers to such opposition shall be filed and served on defendants promptly thereafter.

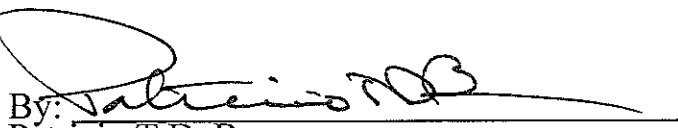
Plaintiff requests the court to consolidate the hearing with the trial on the merits, ie, to advance the trial and consolidate it with the hearing pursuant to FRCP Rule 65(a)(1). Plaintiff is prepared to give security pursuant to FRCP Rule 65(c) to obtain the TRO.

1 Notice of this application and relief requested herein, was delivered,
2 pursuant to Local Rule 7-19.1, by electronic mail to opposing counsel, Scott
3 Edelman, Esq. and Michael Dore, Esq. on Thursday, July 1, 2010 at 3:25 p.m., as
4 indicated by Exhibit 1 to the declaration of Patricio T.D. Barrera.

5 This application and motion will be based on this Notice, the attached
6 Memorandum of Points and Authorities, the Declarations of Benjamin Padnos,
7 Patricio Barrera and Andrew Ball, and Exhibits attached thereto; the concurrently
8 filed [Proposed] Order; any such matter, record, document and/or information of
9 which this Court may appropriately take judicial notice; all the pleadings, papers,
10 records and information on file in this action; and any such other oral and/or
11 documentary evidence as the Court may consider in connection with this *Ex Parte*
12 Application.

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14 Dated: July 2, 2010

BARRERA & ASSOCIATES

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16 By: 
17 Patricio T.D. Barrera
18 Attorneys for Plaintiff DONE! Ventures, LLC
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